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12 *Attorneys for Plaintiffs*

13 **IN THE UNITED STATES DISTRICT COURT**
14 **FOR THE DISTRICT NEVADA**

15 KEVIN O'DONNELL, individually and on behalf of
16 all those similarly situated,

Case No. 2:21-cv-00613-RFB-BNW

17 Plaintiffs,

18 vs.

19 GEICO ADVANTAGE INSURANCE
20 COMPANY, GEICO CASUALTY COMPANY,
GEICO CHOICE INSURANCE COMPANY,
GEICO GENERAL INSURANCE COMPANY,
GEICO INDEMNITY COMPANY, GEICO
21 SECURE INSURANCE COMPANY, and DOES
1 through 10,

**STIPULATION AND
(PROPOSED) ORDER TO
EXTEND TIME FOR
PLAINTIFFS TO FILE
OPPOSITION TO DEFENDANT'S
MOTION TO DISMISS
AMENDED COMPLAINT
(First Request)**

22 Defendants.

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25 COME NOW Plaintiff Kevin O'Donnell ("Plaintiff") and Defendants Geico Advantage
26 Insurance Company, Geico Casualty Company, Geico Choice Insurance Company, Geico
27 General Insurance Company, Geico Indemnity Company, Geico Secure Insurance Company, and
28 Does 1 through 10, (collectively, "Defendants"), by and through their respective attorneys of

1 record herein stipulate, agree, and make joint application to extend the time for Plaintiff to file an
2 Opposition to Defendants' Motion to Dismiss Amended Complaint as follows:

3 WHEREAS Defendants filed a Motion to Dismiss Amended Complaint on June 24, 2022;

4 WHEREAS Plaintiff's response is due on July 8, 2022;

5 WHEREAS since Plaintiff has a trial in federal court beginning on July 5, 2022, the parties
6 have agreed that the proposed modifications to the briefing schedule will not prejudice any party
7 to this action;

8 WHEREAS this is the first stipulation for an extension of time in this case.

9 Accordingly, Plaintiff and Defendants hereby move the Court to grant an order as follows:

10 1. Plaintiff's Opposition to Defendants' Motion to Dismiss Amended Complaint is
11 due on or before August 15, 2022,

12 2. Defendants' Reply in Support of their Motion to Dismiss Amended Complaint is
13 due on or before August 30, 2022.

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1 The parties respectfully request that the Court so orders.

2 DATED this 8th day of July 2022.

3 **MATTHEW L. SHARP, LTD.**

4 _____
5 /s/ Matthew L. Sharp
6 MATTHEW L. SHARP, ESQ.
7 Nevada Bar No. 4746
8 432 Ridge Street
9 Reno, NV 89501
10 matt@mattsharplaw.com
11 *Attorneys for Plaintiffs*

DATED this 8th day of July 2022.

DUANE MORRIS LLP

/s/ Damon N. Vocke
DAMON N. VOCKE, ESQ.
Admitted pro hac vice
1540 Broadway
New York, NY 10036-4086
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Attorneys for Defendants

8 DATED this 8th day of July 2022.

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17 *Attorneys for Plaintiffs*

DATED this 8th day of July 2022.

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Attorneys for Defendants

15 **ORDER**

16 Upon the Stipulation of the Parties herein, IT IS ORDERED:

17 1. Plaintiff's Response to Defendants' Motion to Dismiss Amended Complaint is due
18 on or before August 15, 2022.

19 2. Defendants' Reply in Support of Their Motion to Dismiss Amended Complaint is
20 due on or before August 30, 2022.

21 Dated this 11th day of July 2022.

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23 **RICHARD E. BOULWARE, II**
24 United States District Court

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1 **CERTIFICATE OF SERVICE**

2 Pursuant to FRCP 5(b), I hereby certify that I am an employee of MATTHEW L. SHARP,
3 LTD., and that on this date I electronically filed the foregoing with the Clerk of the Court by
4 using the CM/ECF system which will send a notice of electronic filing to:

5 Duane B. Heidtke, Esq. at dbheidtke@duanemorris.com
6 Damon N. Vocke, Esq. at dnvocke@duanemorris.com

7 DATED this 8th day of July 2022.

8 /s/ Suzy Thompson
9 An Employee of Matthew L. Sharp, Ltd.

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